

U.S. Department of Justice



*United States Attorney
Southern District of New York*

86 Chambers Street
New York, New York 10007

January 17, 2020

BY ECF

Honorable Paul A. Engelmayer
United States District Judge
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Open Society Justice Initiative v. Central Intelligence Agency, et al.*,
No. 19 Civ. 234 (PAE) (BCM)
Open Society Justice Initiative v. Department of Justice, et al.,
No. 19 Civ. 1329 (PAE) (BCM)

Dear Judge Engelmayer:

We write pursuant to the Court's October 3, 2019 order, ECF No. 100, to submit a joint status letter. The remaining defendant agencies in these consolidated cases are ODNI, CIA, State, and DOD.

ODNI and CIA. On December 9, 2019, CIA and ODNI filed their opening brief and other papers in support of their motion for summary judgment. *See* ECF Nos. 111-16. Plaintiff's cross-motion and response is due by January 21, 2020. *See* ECF No. 120.

State and DOD. DOD has completed processing of all documents gathered in its searches. State is continuing processing consistent with the Court's orders.

We thank the Court for its attention to this matter.

Honorable Paul A. Engelmayer
January 17, 2020

Page 2

Respectfully submitted,

By: /s/ Catherine Amirfar
Catherine Amirfar
(camirfar@debevoise.com)
Matthew Forbes
(mforbes@debevoise.com)
Ashika Singh
(asingh@debevoise.com)
DEBEVOISE & PLIMPTON LLP
919 Third Avenue
New York, New York 10022
Tel.: (212) 909-6000

Amrit Singh
James A. Goldston
OPEN SOCIETY JUSTICE INITIATIVE
224 West 57th Street
New York, New York 10019
Tel.: (212) 548-0600
Counsel for Plaintiff

GEOFFREY S. BERMAN
United States Attorney for the
Southern District of New York

By: /s/ Natasha W. Teleanu
PETER ARONOFF
NATASHA W. TELEANU
Assistant United States Attorneys
Telephone: (212) 637-2697/2528
Facsimile: (212) 637-2717
E-mail: peteraronoff@usdoj.gov
natashateleanu@usdoj.gov

Counsel for Defendants